

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**GILBERT JAMES  
SUSAN CHANDLER  
THERESA HOOD  
ADEDAYO PETERSON  
JOYCE RIDGLEY, on behalf of  
themselves and all others similarly situated,**

**Plaintiffs,**

**V.**

**EXPERIAN INFORMATION SOLUTIONS,  
INC.,**

**Defendant.**

Civil Action No. 3:12-cv-902-REP

Judge: The Hon. Robert E. Payne

**MOTION TO WITHDRAW APPEARANCE AS COUNSEL  
FOR EXPERIAN INFORMATION SOLUTIONS, INC.**

The undersigned respectfully requests that the Clerk of the Court withdraw the appearance of Alesha M. Dominique, admitted *pro hac vice*, as counsel of record for Experian Information Solutions, Inc. (“Experian”) in this matter. Ms. Dominique is leaving the law firm of Jones Day on February 14, 2014 and will be unable to continue her representation of Experian in this matter.

Experian will continue to be represented by Daniel J. McLoon, Joseph W. Clark, and Edward M. Wenger of Jones Day who have already entered their appearance in this matter.

Respectfully submitted,

Dated: February 12, 2014

/s/ Joseph W. Clark

Joseph W. Clark (VA Bar. No. 42664)

Joseph W. Clark (VA Bar. No. 42664)

Edward M. Wenger (admitted *pro hac vice*)

Alesha M. Dominique (admitted *pro hac vice*)

JONES DAY

51 Louisiana Avenue, N.W.

Washington, DC 20001-2113

Telephone: (202) 879-3939

Facsimile: (202) 626-1700

Email: jwclark@jonesday.com

Email: emwenger@jonesday.com

Email: adominique@jonesday.com

Daniel J. McLoon (admitted *pro hac vice*)

JONES DAY

555 South Flower Street, Fiftieth Floor

Los Angeles, CA 90071

Telephone: (213) 243-2580

Facsimile: (213) 243-2539

E-mail: djmcloon@jonesday.com

*Counsel for Defendant*

*EXPERIAN INFORMATION SOLUTIONS, INC.*

**CERTIFICATE OF SERVICE**

The foregoing was filed this 12th day of February, 2014 using the CM/ECF system,  
which will then send a notification of such filing (NEF) to the following:

Leonard A. Bennett  
Susan Mary Rotkis  
CONSUMER LITIGATION ASSOCIATES, P.C.  
763 J. Clyde Morris Blvd., Suite 1-A  
Newport News, VA 23601  
Telephone: 757.930.3660  
Facsimile: 757.930.3662  
Email: lenbennett@clalegal.com  
Email: srotkis@clalegal.com

*Counsel for Plaintiffs*  
*GILBERT JAMES, SUSAN CHANDLER,*  
*THERESA HOOD, ADEDAYO PETERSON, and*  
*JOYCE RIDGLEY, on behalf of*  
*themselves and all others similarly situated.*

Ian Bryce Lyngklip  
LYNGKLIP & ASSOCIATES  
CONSUMER LAW CENTER, PLC  
24500 Northwestern Hwy, Suite 206  
Southfield, MI 48075  
Telephone: 248.208.8864  
Facsimile: 248.208.9073  
Email: ian@michiganconsumerlaw.com

*Counsel for Plaintiffs*  
*GILBERT JAMES, SUSAN CHANDLER,*  
*THERESA HOOD, ADEDAYO PETERSON, and*  
*JOYCE RIDGLEY, on behalf of*  
*themselves and all others similarly situated.*

Matthew J. Erausquin  
Janelle E. Mason  
Casey S. Nash  
CONSUMER LITIGATION ASSOCIATES, P.C.  
1800 Diagonal Road, Suite 600  
Alexandria, VA 22314  
Telephone: 703.273.7770  
Facsimile: 888.892.3512  
Email: matt@clalegal.com  
Email: janelle@clalegal.com  
Email: casey@clalegal.com

*Counsel for Plaintiffs*  
*GILBERT JAMES, SUSAN CHANDLER,*  
*THERESA HOOD, ADEDAYO PETERSON, and*  
*JOYCE RIDGLEY, on behalf of*  
*themselves and all others similarly situated.*

Justin Michael Baxter  
BAXTER & BAXTER LLP  
8835 SW Canyon Lane, Suite 130  
Portland, OR 97225  
Telephone: 503.297.9031  
Facsimile: 503.291.9172  
Email: justin@baxterlaw.com

*Counsel for Plaintiffs*  
*GILBERT JAMES, SUSAN CHANDLER,*  
*THERESA HOOD, ADEDAYO PETERSON, and*  
*JOYCE RIDGLEY, on behalf of*  
*themselves and all others similarly situated.*

Respectfully submitted,

/s/ Joseph W. Clark

Joseph W. Clark (VA Bar. No. 42664)

Joseph W. Clark (VA Bar. No. 42664)

Edward M. Wenger (admitted *pro hac vice*)

Alesha M. Dominique (admitted *pro hac vice*)

JONES DAY

51 Louisiana Avenue, N.W.

Washington, DC 20001-2113

Telephone: (202) 879-3939

Facsimile: (202) 626-1700

Email: jwclark@jonesday.com

Email: emwenger@jonesday.com

Email: adominique@jonesday.com

Daniel J. McLoon (admitted *pro hac vice*)

JONES DAY

555 South Flower Street, Fiftieth Floor

Los Angeles, CA 90071

Telephone: (213) 243-2580

Facsimile: (213) 243-2539

E-mail: djmcloon@jonesday.com

*Counsel for Defendant*

*EXPERIAN INFORMATION SOLUTIONS, INC.*

Robert E. Payne  
United States District Judge